

# FRESHFIELDS

**Via ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
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March 20, 2025

**Re: *In re Google Digital Advertising Antitrust Litigation*, 1:21-md-03010 (PKC); *Rumble Canada Inc. v. Google LLC*, 1:24-cv-09904 (PKC)**

Dear Judge Castel,

We write jointly on behalf of Defendants Google LLC and Alphabet Inc. (together, “Google”) and Plaintiff Rumble Canada Inc. (“Rumble”) in connection with the transfer of the *Rumble Canada* matter to the above-referenced Multidistrict Litigation. ECF No. 895.

At the time of transfer, Google’s Motion to Dismiss Rumble’s Amended Complaint in the Northern District of California was not fully briefed, and the parties had previously agreed to a stay of discovery pending resolution of Google’s motion. The parties have since met and conferred, and with the Court’s permission, agree to the following terms:

- (1) Rumble may file a second amended complaint on or before April 18, 2025;
- (2) If Google seeks to move to dismiss Rumble’s operative complaint, Google shall file a letter brief seeking permission to do so no later than May 9, 2025;
- (3) If the Court grants permission for Google to file a motion to dismiss, such motion will be due 30 days after the Court’s ruling. Rumble will have 30 days to oppose, and Google will have 21 days to reply.
- (4) All discovery is currently stayed and shall be stayed while Google’s motion to dismiss is pending.

Google and Rumble therefore respectfully request that the Court endorse the parties’ mutually agreed upon terms and briefing schedule.

Sincerely,

March 20, 2025

Page 2

/s/ Robert W. Dickerson, Jr.

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CC: All Counsel of Record (via ECF)